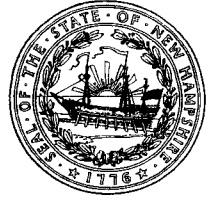




The State of New Hampshire
Department of Environmental Services



Michael P. Nolin
Commissioner

June 20, 2006

Mr. Raymond Bissoneau
President
Electropac Co., Inc.
252 Willow Street
Manchester, New Hampshire 03103-6294

CERTIFIED MAIL (7005 1160 0004 7467 6895)
RETURN-RECEIPT REQUESTED

NOTICE OF PAST VIOLATION
(Sta.S)

Dear Mr. Bissoneau:

On March 2, 2006, the New Hampshire Department of Environmental Services, Air Resources Division ("DES") conducted a compliance inspection at Electropac Co., Inc., ("Electropac") at 252 Willow Street, Manchester, New Hampshire. The purpose of the inspection was to determine Electropac's compliance status with the N.H. Administrative Rules Env-A 100 *et seq.*, NH Rules Governing the Control of Air Pollution, and Temporary Permit to Operate No. FP-T-0122 ("Temporary Permit"). The purpose of this letter is to notify you of the violations discovered during the Inspection. The specific violations are as follows:

1. Env-A 1405.01 requires the owner or operator of any device or process that emits a regulated toxic air pollutant ("RTAP") to determine compliance with the ambient air limits by using one of the methods provided in Env-A 1405 and, upon request, to provide documentation of compliance with the ambient air limits to DES. During the inspection, DES personnel observed that Electropac has added new processes since the Temporary Permit was issued, which include a copper and tin hand plating line for smaller circuit board orders and an additional solder process to provide an alternative to the use of lead solder. During the inspection, Electropac was not able to demonstrate that it had conducted a review of RTAP emissions from the new process. On April 7, 2006, DES received an annual emissions report and an application for State Permit to Operate from Electropac, which included monthly emission data for the printed circuit board manufacturing process. Based upon its review of the emission data that was submitted, DES has determined that emissions from the new process comply with the ambient air limits set forth in Env-A 1400.
2. Env-A 608.02 requires the owner or operator of a source or device that has been issued a temporary permit to submit an application for a state permit to operate to DES at least 90 days prior to the designated expiration date of the temporary permit. Electropac's Temporary Permit expires on June 30, 2006. DES received a permit application from Electropac on April 4, 2006.

DES recognizes the efforts that Electropac has taken to come into compliance. Accordingly, no further action in response to the listed violations is required.

DES requests that Electropac comply with the NH Rules Governing the Control of Air Pollution and all obligations contained in any permit issued to Electropac in the future. Specifically, please be reminded that, according to Env-A 1405, if any process is added or altered that emits a RTAP, it is Electropac's responsibility to determine and document compliance with the ambient air limits. DES annually amends the list of RTAPs and their ambient air limits. To keep abreast of these changes, please visit the DES website at <http://des.nh.gov/ard/RuleChanges.htm>.

In the event that other violations are identified or if Electropac fails to comply with all applicable requirements in the future, DES may take action against Electropac, including issuing an administrative order, seeking administrative fines, and/or referring the matter to the NH Department of Justice.

If you believe that DES has cited these violations in error, or have questions regarding these matters, please contact Barbara Hoffman at (603) 271-7874, Air Resources Division, Compliance Bureau. A current copy of the Air Resource Division rules can be obtained from the DES website at <http://www.des.nh.gov/rules/air.htm> or by contacting the DES Public Information Center at (603) 271-2975.

Sincerely,

A handwritten signature in black ink, appearing to read 'Pamela G. Monroe', is written over the word 'COPY' which is printed in a large, bold, sans-serif font.

Pamela G. Monroe
Compliance Bureau Administrator
Air Resources Division

PGM/asb

cc: R. Kurowski, EPA Region 1
G. Hamel, DES Legal Unit Administrator
F. Guinta, Mayor, City of Manchester
Geoffrey Currier, Compliance Manager, Electropac Co., Inc.
AFS # 3301190368